

ORIGINAL

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

IN THE UNITED STATES DISTRICT COURT 2019 NOV 27 PM 1:36  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

DEPUTY CLERK RU

IN RE:

\$58,960.00 IN U.S. CURRENCY

Misc. Case No. 19-MC- 99 - M

**JOINT MOTION TO EXTEND  
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America and Claimant Kyle Haynes, through his attorney of record, Luke Metzler, jointly move, pursuant to 18 U.S.C. § 983(a)(3)(A), for a 60-day extension of time to file a judicial action regarding property to which Haynes has filed a claim in an administrative forfeiture proceeding with the Drug Enforcement Administration (DEA), and in support state:

1. DEA seized \$58,960.00 in U.S. Currency on or about May 14, 2019, at DFW International Airport in Tarrant County, Texas.
2. DEA sent written notice of intent to forfeit the seized property to all potentially interested parties as required by 18 U.S.C. § 983(a)(1)(A). On September 3, 2019, Haynes, through his attorney of record, filed a claim to the property with the DEA.
3. No other person has filed a claim to the property, and the time to do so under 18 U.S.C. § 983(a)(2)(A)-(E) has expired.
4. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action no later than 90 days after a claim has been filed or return the

seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

5. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with Haynes' claim expires on December 2, 2019.

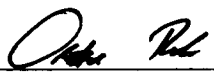
6. The parties have agree to extend the time for filing a judicial action for 60 days, to and including January 31, 2020.

### **CONCLUSION**

Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including January 31, 2020.

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:

\$58,960.00 IN U.S. CURRENCY,

Misc. Case No. 19-MC-

**ORDER EXTENDING TIME  
TO FILE JUDICIAL FORFEITURE ACTION**

Before the court is the parties' joint motion to extend the time to file a judicial forfeiture action \$58,960.00 in U.S. Currency seized from claimant Kyle Haynes, on or about May 14, 2019 at DFW International Airport in Tarrant County, Texas. The United States and Haynes have agreed to extend the current deadline of December 2, 2019. No other parties made a claim to the property during the administrative forfeiture proceeding.

The court being authorized by 18 U.S.C. § 983(a)(3)(A) to extend the time in which the United States is required to file a complaint for forfeiture against the property or obtain an indictment alleging that the property is subject to forfeiture based upon agreement of the parties; it is

ORDERED, pursuant to 18 U.S.C. § 983(A)-(C), that the date by which the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture is extended to January 31, 2020.

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UNITED STATES DISTRICT JUDGE